

Tracy DeCaussein
03/19/2021

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 KOHCHISE JACKSON,
6 Plaintiff,

7 vs.

No. 2:19-cv-13382
Hon.: Terrence G. Berg
Mag.: Patricia T. Morris

8 CORIZON HEALTH, Inc. et al,
9 Defendant,

10 _____ /

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12

13 The Deposition of TRACY DeCAUSSIN,
14 Taken at 737 Woodlawn Ave,
15 Jackson, Michigan,
16 Commencing at 1:31 p.m.,
17 Friday, March 19, 2021,
18 Before Melinda R. Womack, CSR3611.
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1 APPEARANCES:

2

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19 Appearing on behalf of Defendant Prime Healthcare

20 Services and Colleen Spencer.

21

22

23 Appearances Continued. . .

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8 Appearing on behalf of Defendants Corizon Health,

9 Inc. and Keith Papendick, M.D.

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(None Marked)

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1 Jackson, Michigan

2 Friday, March 19, 2021

3 About 1:31 p.m.

4 VIDEOGRAPHER: We are on the record.

5 This is the video deposition of Tracy DeCaussein being
6 taken virtually through Zoom. Today is Friday, March
7 19, 2021. Time on the record is approximately 1:31
8 p.m. At this time, will the attorneys please
9 identify themselves and affiliations for the record
10 and then our court reporter will swear in the
11 witness.

12 MR. CROSS: Good afternoon. Ian Cross
13 for the plaintiff, Kohchise Jackson.

14 MR. CORBET: Good afternoon. This is Dan
15 Corbet on behalf of Colleen Spencer and Lake Huron
16 Medical Center.

17 MR. SCARBBER: Good afternoon. This is
18 Devlin Scarber on behalf of Corizon and Dr. Keith
19 Papendick.

20 MR. SHOUDY: This is Todd Shoudy on
21 behalf of the witness and St. Clair County.

22 TRACY DECAUSSIN,
23 having first been duly sworn, was examined and testified
24 on her oath as follows:

25 EXAMINATION BY MR. CROSS:

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1 Q. Good afternoon, Ms. DeCaussein. Did you have the
2 opportunity to review any documents in preparation
3 for today's deposition?

4 **A. I did.**

5 Q. What documents did you review?

6 **A. The contract that was viable at the time in question.**

7 Q. Okay. I'm going to show you a document. Is this
8 contract the contract you reviewed?

9 **A. Yes.**

10 Q. I take it you recognize it?

11 **A. Yes.**

12 Q. And I see that the contracting parties are the County
13 of St. Clair and Trinity Health Michigan, d/b/a St.
14 Joseph Mercy Port Huron. Do you know if Trinity
15 Health Michigan ever assigned its rights and
16 responsibilities under this contract to another
17 party?

18 MR. CORBET: Form and foundation. Sorry.
19 Go ahead.

20 **A. I do know that Trinity Healthcare was assumed at some**
21 **point under Prime Healthcare, I believe.**

22 Q. (By Mr. Cross, continuing) Do you know when that
23 occurred?

24 **A. I do not know the exact time.**

25 Q. Okay. Do you know who wrote this contract?

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1 **A. I do not.**

2 Q. Did the County -- well, all right. I'm going to
3 direct your attention to, I believe it is attachment
4 one, the scope of contracting services.

5 MR. CORBET: Ian, let me just put a
6 continuing objection here since I'm not as intimately
7 familiar with this contract as Ken Willis is. Ken
8 Willis is on vacation. My objection, because I
9 noticed that the expiration date is December 31st,
10 2016, so it might not apply to 2017. It certainly
11 might. I'm not saying it does or it doesn't at this
12 point in time. Please continue with the deposition,
13 but I just wanted to preserve that because Mr. Willis
14 is probably better able to answer that right now.

15 Q. (By Mr. Cross, continuing) All right. So see where
16 it says this attachment one scope of contractor
17 services?

18 **A. Yes.**

19 Q. See where it says healthcare services, SJMPHCHCS? Do
20 you know what SJMPHCHCS is?

21 **A. No.**

22 Q. All right.

23 **A. It's the hospital's acronyms, but the names on it,**
24 **I'm not a hundred percent sure.**

25 MR. CORBET: Ian, you want some help?

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1 **A. It says it right above it. It's St. Joseph Mercy**
2 **Port Huron Correctional Healthcare Services. Sorry.**

3 MR. CORBET: There you go.

4 **Q. (By Mr. Cross, continuing) That's the contracting**
5 **party, correct?**

6 **A. Yes.**

7 **Q. All right. And when it says it will**
8 **provide/coordinate healthcare and related services**
9 **consistent with community standards, what does that**
10 **mean?**

11 MR. CORBET: Same objection.

12 **A. I don't know.**

13 **Q. (By Mr. Cross, continuing) So the County doesn't know**
14 **what that means?**

15 **A. Well I can speculate what it means because I didn't**
16 **write this contract, so I'm guessing it would mean in**
17 **coordination with health services standards across**
18 **the board as far as maybe licensing, levels of care,**
19 **the obligations that way.**

20 **Q. Let's go down to work plans. You contracted to**
21 **receive eight hours a day of onsite services along**
22 **with 24/7 program oversight from the RN coordinator.**
23 **What is 24/7 program oversight?**

24 **A. So we have 24/7 care here in our facility, and that**
25 **RN coordinator position would be responsible, even if**

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1 they're not here on site, to have oversight of the
2 coverage that takes place in the evenings in our
3 facility.

4 Q. Do you know who the RN coordinator was in 2016 and
5 2017?

6 A. I guess looking for clarification on that question
7 because if there was any change in staffing what that
8 would look like, but under looking at what you're
9 providing, I'm going to say it must have been Colleen
10 at that time.

11 Q. Do you know Colleen's last name?

12 A. I think it's DeWalt. I'm not sure. I apologize.

13 Q. Directing your attention to bullet point two, when it
14 says the RN coordinator will act as a case manager
15 for coordination of all medical services for inmates.
16 What does a case manager do?

17 MR. CORBET: Form and foundation.

18 MR. SCARBET: Join.

19 A. For me to answer that question, they're overseeing
20 the cases that are here taking place in our facility.

21 Q. (By Mr. Cross, continuing) Why did the County put
22 that in the contract?

23 MR. CORBET: Same.

24 A. Because I didn't, I didn't write this contract, I
25 would be speculating.

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1 Q. (By Mr. Cross, continuing) Do you know the specific
2 functions and responsibilities that were designated
3 by the County to this entity?

4 **A. I'm sorry. Can you repeat that?**

5 Q. So, I'm sorry. Are you aware of the specific
6 functions and responsibilities that were delegated by
7 the County to this entity, St. Joseph Mercy Port
8 Huron Correctional Healthcare Services?

9 MR. SHOUDY: Ian, are you talking about
10 something different than is in this contract that
11 spells it out for three pages what those are? I
12 don't understand your question. It goes on for three
13 pages what all the things they're supposed to do
14 under the contract.

15 MR. CROSS: I'm trying to ask the County
16 about what all the things in the contract mean and
17 she doesn't know.

18 MR. SHOUDY: Ask a specific question.

19 Q. (By Mr. Cross, continuing) Okay. So see this bottom
20 bullet point where it says care plan development and
21 implementation in coordination of care? What is care
22 plan development?

23 **A. This is my opinion would be what it's meaning is that**
24 **the care plan development and implementation is makes**
25 **like upon release or when they're here, if they're --**

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1 maybe they have some type of medical issue that
2 they're assisting with or as they're getting ready to
3 transition outside of the facility, a care plan
4 development would be so when you're leaving, this is
5 what we're recommending, this is what we're giving
6 you. Or in the coordination of care would be, an
7 example might be our local community mental health,
8 is it somebody who's seeking mental health services,
9 that coordination of care comes into play.

10 Q. So care plan development, does that involve making
11 medical decisions for the inmates?

12 MR. CORBET: Form and foundation.

13 A. I'm sorry. As far as the medical making the medical
14 decisions in the care plan?

15 Q. (By Mr. Cross, continuing) So say you had an inmate
16 -- what I'm trying to get at is what responsibilities
17 was the County delegating to the contractor in this
18 contract? And when the contract says that the RN
19 coordinator is responsible for care plan development,
20 what does that mean?

21 MR. CORBET: Same objection.

22 MR. SHOUDY: And we already answered
23 that.

24 A. In relation -- yeah. Did I not answer that question?
25 I'm sorry.

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1 Q. (By Mr. Cross, continuing) Okay. I'll move on.

2 **A. Okay.**

3 Q. So this administration section says here that the RN
4 coordinator will be responsible for planning,
5 implementing and direction operational functions of
6 Healthcare services of the correctional facility. Is
7 determining medical necessity of a surgical procedure
8 an operational function?

9 MR. CORBET: Can I just put a form and
10 foundation objection? You skipped half of that line.

11 Q. (By Mr. Cross, continuing) Go ahead. You can answer.

12 **A. I'm sorry, will you repeat the question?**

13 Q. You see where it says the physician, physician
14 extender and the RN coordinator will be responsible
15 for the planning, implementing and directing
16 operational functions of healthcare services of the
17 correctional facility?

18 **A. Yes.**

19 Q. Does determining the medical necessity of a surgical
20 procedure fall under operational function of
21 healthcare services at correctional facilities?

22 MR. CORBET: Just form and foundation,
23 you also skipped the beginning of that sentence, but
24 go ahead. I'm sorry.

25 **A. Yes.**

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1 Q. (By Mr. Cross, continuing) It does. So is it fair to
2 say that the RN coordinator, and the physician,
3 physicians extender are responsible for determining
4 whether a surgical procedure should occur or needs to
5 occur under this contract?

6 MR. CORBET: Form and foundation.

7 **A. Yes.**

8 Q. (By Mr. Cross, continuing) Okay.

9 MR. CROSS: I don't have any further
10 questions.

11 MR. CORBET: This is Dan Corbet. Is it
12 officer? Is that the way to --

13 **THE WITNESS: Lieutenant Olejnik?**

14 MR. CORBET: Lieutenant? I'm sorry.
15 Lieutenant, I just have a few follow-up questions.
16 Is that okay?

17 MR. SHOUDY: Mr. Corbet, she's not
18 Lieutenant Olejnik. She's Tracy DeCaussin.

19 MR. CORBET: Oh, I'm sorry.

20 **THE WITNESS: I'm a current jail**
21 **administrator.**

22 EXAMINATION BY MR. CORBET:

23 Q. Just to follow up what you were asked by Mr. Cross.

24 MR. CORBET: Could you put that back up
25 there, please.

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1 MR. CROSS: Sure.

2 Q. (By Mr. Corbet, continuing) And subject to my
3 original objection, the sentence that you were asked
4 about does have a first part of it, doesn't it?

5 **A. Yes.**

6 Q. And it says as permitted by law and third party
7 agreements and within the scope of services offered,
8 correct?

9 **A. Yes.**

10 Q. Okay. But once again, you would leave it to the
11 medical staff to decide whether or not a surgery was
12 medically necessary, correct?

13 **A. Yes.**

14 Q. And how they went about determining that necessity,
15 you probably might not be familiar with, correct?

16 **A. Correct.**

17 Q. So I asked the earlier witness about how the outside
18 medical bills incurred by jail inmates that are
19 transferred to a hospital for surgery, for instance,
20 how those bills are covered. He said you might be a
21 better person to ask. Can you answer that question?

22 **A. Yes. They're paid, if they're not paid by a**
23 **secondary insurance or an insurance that the**
24 **individual may have, they would fall on the**
25 **responsibility of the County.**

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1 Q. So, for instance, with respect to the Plaintiff in
2 this case, he did have surgery in December, I don't
3 know if you're aware of that or not, December of
4 2016. Are you aware of that?

5 **A. I'm not.**

6 Q. Okay. So hypothetically, if he did have surgery in
7 December of 2016 and didn't have an insurance company
8 to pay for it, the County would pick up that bill and
9 pay whatever hospital he had the surgery at?

10 **A. Correct.**

11 Q. Likewise, if he was sent out for another surgery in
12 2017 and he didn't have insurance to cover it, the
13 hospital would pick up that bill to whatever hospital
14 he was going to, is that fair?

15 **A. I'm sorry, are you saying he's not incarcerated**
16 **anymore?**

17 Q. No, I'm sorry. My bad. Good point. The person
18 who's an inmate at the jail in let's say February of
19 2017 and was being sent to have surgery and did not
20 have insurance covering it, the hospital bill would
21 be covered and the doctor bill for the outside
22 services would be covered by the County in that case,
23 right?

24 **A. Yes. Correct.**

25 Q. Okay.

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1 MR. CROSS: That's all I have. Thank you
2 very much. I appreciate your time.

3 **THE WITNESS: You're welcome.**

4 MR. SCARBER: Ian, could you do me a
5 favor and just leave that up there for a second?

6 MR. CROSS: Sure.

7 EXAMINATION BY MR. SCARBER:

8 Q. Ms. DeCaussein, my name's attorney Devlin Scarber, and
9 I just have a few follow-up questions for you. What
10 is a, what is a physician/physician extender, if you
11 know?

12 **A. I believe it's a physician, I'm guessing a physician**
13 **extender would be like an M.D., but I don't, I don't**
14 **a hundred percent know.**

15 Q. My next question for you is what is your position
16 with the County?

17 **A. I am a current jail administrator.**

18 Q. And how long have you been in that position?

19 **A. Since December 1st of 2019.**

20 Q. And who was the jail administrator back in 2016 and
21 2017?

22 **A. Captain Tom Bliss.**

23 Q. Can you spell that?

24 **A. B-L-I-S-S.**

25 Q. Another question for you, the gentleman that just

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1 gave his testimony, Lieutenant Olejnik, what is his
2 position with the jail, if you know?

3 **A. He's a Lieutenant.**

4 Q. Where does he, what is his position specifically in
5 the jail? Does he work in a specific area or
6 department, if you're aware?

7 **A. He would oversee all operations, operations in the**
8 **facility within the confines of the jail.**

9 Q. And we should have asked him. I didn't think about
10 it at the time, but do you know how long he's been
11 there? Was he there in 2016 and 2017 in that role,
12 if you're aware?

13 **A. I believe he was a sergeant at the time.**

14 MR. SCARBER: I don't have anything
15 further for you, ma'am. Thank you.

16 **THE WITNESS: Okay. You're welcome.**

17 MR. CROSS: Nothing further.

18 MR. CORBET: I think we're done,
19 everybody.

20 VIDEOGRAPHER: That concludes the
21 deposition. We're going off the record. The time is
22 1:52.

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CERTIFICATE OF NOTARY

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STATE OF MICHIGAN)

) SS

COUNTY OFF OAKLAND)

I, Melinda R. Womack, Certified Shorthand
Reporter, a Notary Public in and for the above County
and state, do hereby certify that the above
deposition was taken before me at the time and place
hereinbefore set forth; that the witness was by me
first duly sworn to testify to the truth, and nothing
but the truth, that the foregoing questions asked and
answers made by the witness were duly recorded by me
stenographically and reduced to computer
transcription; that this is a true, full and correct
transcript of my stenographic notes so taken; and
that I am not related to, nor of counsel to either
party nor interested in the event of this cause.



Melinda R. Womack, CSR-3611

Notary Public,

Oakland County, Michigan

My Commission expires: 06-22-2025

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